



November 4, 2002

Loureiro Engineering Associates, Inc.



RDMS DocID 00100132

U. S. Environmental Protection Agency
JFK Federal Building (HBT)
1 Congress Street
Boston, MA 02114-2023

Attn.: Juan Perez

RCRA RECORDS CENTER
FACILITY: Pratt & Whitney
ID: CT 370672081
R-9
OTHER: RDMS # 100132

RE: Responses to Comments
Statement of Basis – Stadium Parcel
Pratt & Whitney, East Hartford, Connecticut

Dear Mr. Perez:

Attached please find a revised Statement of Basis (SB) that has been prepared by Loureiro Engineering Associates, Inc. (LEA) on behalf of United Technologies Corporation (UTC) for a parcel known as the Stadium Parcel, located on the northern end of the of the Airport/Klondike Area at the Pratt & Whitney (P&W) facility located at 400 Main Street in East Hartford, Connecticut. In August 2000, this approximately 75-acre parcel was given to the State of Connecticut for the development of a football stadium for the University of Connecticut. The purpose of this SB is for use by the United States Environmental Protection Agency (EPA) to solicit public comment on EPA's proposal that no further corrective action is required at the Stadium Parcel.

This revised SB has been prepared in response to comments received from the EPA in an e-mail dated September 19, 2002. The EPA prepared the comments for the SB written by LEA on behalf of UTC and submitted to the EPA on April 9, 2002. This letter identifies the EPA comments in bold with our responses provided immediately thereafter.

1. The Statement of Basis needs to describe how the remedy will meet the remedy performance standards.

With the transfer of the Stadium Parcel, P&W decided to complete the investigation and remediation activities on this 75-acre Site that was formerly part of the P&W Main Street Facility in support of the requirements of the Connecticut Remediation Standard Regulations (RSRs).

For the Stadium Parcel, soil with contaminant concentrations above the Industrial / Commercial Direct Exposure Criteria (IDEC) was excavated along with the use of an Environmental Land Use Restriction (ELUR) in the area to satisfy the criteria for inaccessible soil. Removals were also completed for soils that were above the seasonal high groundwater table and exceeded the GB Pollutant Mobility Criteria (GBPMC). With the excavation of impacted soil and the use of an ELUR, the corrective actions undertaken at the Stadium Parcel support the requirements of the Connecticut RSRs. The text of the SB has been revised accordingly.



2. EPA New England would like to know if there has been more public involvement that could be included with the history of public involvement. We would like to also add that we are accepting comments on an environmental decision about whether a stadium can be safely sited on this parcel of land and not whether a stadium should be sited there.

In addition to the public participation in the form of public comments that EPA is presently requesting, public participation in the activities associated with the Stadium Parcel have included those identified in the revised SB. This is a partial listing, and does not include an ongoing series of meetings that were held by the Connecticut Office of Policy and Management (OPM) with Town of East Hartford officials, members of the East Hartford legislative delegation, businesses and residents, as well as myriad other interested parties. The text of the SB has been revised accordingly.

EPA is requesting comments from the public on its proposal that no corrective action will be required at this Stadium Parcel as the action undertaken support the requirements of the Connecticut RSRs. EPA is also accepting comment on the environmental decision that a football stadium can safely be sited on the Stadium Parcel. The text of the SB has been revised accordingly.

3. Under IV. Release History, the second paragraph mentions the excavation of contaminated soil above the Residential Direct Exposure Criteria. We believe that the Statement of Basis should include more information pertaining to these soil removals: the dates when the removals took place, the amount of soil that was removed and the place where the contaminated soils were disposed of.

In November/December 1998, the initial soil removal activities were conducted for the North Klondike Undeveloped Land Outside Storage Area. Based on the results of confirmational soil sampling conducted, additional soil removals were conducted in March/April 1999. Approximately 540 cubic yards of soil were excavated for offsite disposal at the Northern Capitol Regional Disposal Facility, Inc. (NORCAP) in East Windsor, Connecticut. In May/June and October/November 2001, approximately 600 cubic yards of impacted soil were excavated for offsite disposal at the Niagara Falls Landfill Facility in Niagara Falls, New York. The text of the SB has been revised accordingly.

If you have any questions or comments concerning this information, please contact either Joe Tota of UTC at 860-728-6510 or me at 860-410-2969.

Sincerely,

LOUREIRO ENGINEERING ASSOCIATES, INC.

Thomas J. Salimeno, P.E., L.E.P.

Vice President

Attachments

pc: Joseph Tota, UTC
Ernest Waterman, EPA

STATEMENT OF BASIS

Pratt & Whitney Stadium Parcel East Hartford, Connecticut

EPA ID No. CTD990672081

I. Introduction

The purpose of this Statement of Basis (SB) is to solicit public comment on the United States Environmental Protection Agency (EPA) proposal that no further corrective action is required at the Stadium Parcel, a 75-acre portion of the Pratt & Whitney (P&W) Main Street Facility that has been transferred to the State of Connecticut for the development of a football stadium. The P&W Main Street Facility is located at 400 Main Street, East Hartford, Connecticut.

With the transfer of the Stadium Parcel, P&W decided to complete the investigation and remediation activities on this 75-acre site that was formerly part of the P&W Main Street Facility in support of the requirements of the Connecticut Remediation Standard Regulations (RSRs). This SB describes and summarizes information regarding this Stadium Parcel located in East Hartford, Connecticut. Following a thorough site inspection and an evaluation of existing records and reports for the Stadium Parcel, the EPA believes that no further corrective action is necessary at the Stadium Parcel.

II. Facility Background

The Stadium Parcel is formerly part of the P&W Main Street Facility, which is located on over 960 acres with over 6.5 million square feet of floor area for manufacturing, research, office space, and space for related activities and support services. The entirety of the P&W Main Street Facility is bordered on the north by a residential neighborhood and Silver Lane, on the south by a residential neighborhood and Brewer Street, on the west by Main Street and a residential area, and on the east by a residential area and Penney High School. The P&W Main Street Facility has been used for the manufacture of aircraft engines and aircraft engine components since December 1929.

To the east of the main factory complex of the P&W Main Street Facility lies the approximately 600-acre Airport/Klondike Area consisting of the Rentschler Airport and an area known as the Klondike, formerly used for experimental test operations as well as ancillary support operations for the main factory complex. The 75-acre Stadium Parcel is situated on the northern end of the Airport/Klondike Area.

III. Summary of Stadium Parcel Areas

A total of three potentially contaminated areas or Environmental Units (EUs) were identified within the Stadium Parcel at the P&W Main Street Facility. The three EUs present within the Stadium Parcel include: North Klondike Undeveloped Land Outside Storage Area, Rentschler

Airport Runway Area, and the Rentschler Airport Former Army Barracks.

The North Klondike Undeveloped Land Outside Storage Area, which appears to be the result of historic-filling operations, was located within the North Klondike Undeveloped Land Area. The EU is located to the northeast of the Undeveloped Land Area and measures approximately 180 feet by 360 feet. Based upon a review of aerial photographs, the unit is located in an area that may have been a pond between 1965 and 1969. After the area had been filled, this area was used until the mid-1970s for the storage of equipment and materials, including but not limited to, concrete pipe, large vehicles, and heavy equipment. The storage of the materials may have been associated with the various grading and filling projects for the airport.

The Rentschler Airport Runway Area was developed over the years and presently consists mainly of two runways, each approximately one-mile long, running north to south and northeast to southwest. Based on available drawings, there is a drainage system in the Rentschler Airport. The northern portion of the North Airport drains into Willow Brook. The rest of Rentschler Airport eventually drains into Pewterpot Brook. Based on aerial photographs, there was no evidence of any storage areas, staining, or repair areas in the Rentschler North Airport Runway Area. During airport expansion activities conducted at various times, fill was placed in low-lying areas of the North Airport.

The Rentschler Airport Former Army Barracks extended from the northern end of the north-south runway westward to the present United Technology Research Center (UTRC). The Army Barracks consisted of approximately 33 buildings including barracks, mess halls, recreation halls, a dispensary, warehouses, a school, and a radio with several of these buildings present within the limits of the Stadium Parcel. The typical size of the buildings was 20 feet by 100 feet. Fuel storage and vehicle maintenance areas or buildings were not indicated on the available drawing. Sixteen septic systems of various sizes were installed on the northern end of Rentschler Airport to handle the sanitary wastewater from the various buildings.

IV. Release History

P&W, in coordination with the EPA and the Connecticut Department of Environmental Protection (DEP), has researched this Stadium Parcel by performing a file review and a site survey to identify possible releases to the environment. As a result of this search, all three EUs were identified as having the potential for a release. To investigate the potential for a release, soil and groundwater investigation activities were performed for each of the EUs.

Sampling within the North Klondike Undeveloped Land Outside Storage Area was comprised of soil borings, test pits, discrete groundwater samples, and fixed monitoring well installations. In summary, the sampling and analyses indicated that the concentrations of metals detected in the soil samples are typical of background concentrations, except for several metals at a depth of 2 to 4 feet. Arsenic and lead were detected at concentrations that exceeded the residential direct exposure criteria (RDEC) and industrial/commercial direct exposure criteria (IDEC) of the Connecticut RSRs. The concentration of total petroleum hydrocarbons (TPH) from borings exceeded the RDEC, IDEC, and GB pollutant mobility criteria (GBPMC). The concentration of polychlorinated biphenyls (PCBs) exceeded the RDEC, IDEC, and GBPMC.

For the North Klondike Undeveloped Land Outside Storage Area, soil with contaminant

concentrations (metals, TPH and PCBs) above the IDEC was excavated along with the use of an Environmental Land Use Restriction (ELUR) in the area to satisfy the criteria for inaccessible soil. Removals were also completed for soils that were above the seasonal high groundwater table and exceeded the GBPMC. With the completion of the soil removal activities and the implementation of the ELUR, no further corrective action is required for this EU. The excavation of impacted soil and the use of an ELUR support the requirements of the Connecticut RSRs.

In November/December 1998, the initial soil removal activities were conducted for the North Klondike Undeveloped Land Outside Storage Area. Based on the results of confirmational soil sampling conducted, additional soil removals were completed in March/April 1999. Approximately 540 cubic yards of soil were excavated for offsite disposal at the Northern Capitol Regional Disposal Facility, Inc. (NORCAP) in East Windsor, Connecticut. In May/June and October/November 2001, approximately 600 cubic yards of impacted soil were excavated for offsite disposal at the Niagara Falls Landfill Facility in Niagara Falls, New York.

In order to investigate the potential for contaminated pond sediments used in low-lying areas of Rentschler Airport Runway Area, soil borings were advanced in suspected low-lying portions of the Rentschler Airport Runway Area. These low-lying areas were primarily identified from historical aerial photographs. During the completion of these borings, soil samples were collected for visual inspection. Since the fill material of concern was potentially impacted pond sediment, visual evidence and instrument screening were considered ample for this investigation. When visual or instrument evidence indicated potential contamination, samples would be collected for analysis. Based on the lack of visual or instrument evidence, no soil samples from these soil borings were submitted for laboratory analysis. With the completion of the soil investigation activities, no further corrective action is required for this EU.

A geophysical investigation has been conducted to determine the presence or absence of the sixteen septic systems associated with the Rentschler Airport Former Army Barracks. Ground Penetrating Radar (GPR) survey lines were run over fourteen of the septic system locations shown on the available drawing of the area. Three of the septic systems locations within the Stadium Parcel had GPR signatures indicating that septic systems may have been present. Soil borings were advanced in the vicinity of locations that had GPR signatures indicating the possible presence of septic systems or previously disturbed areas. Soil samples were collected from each of the borings for analysis. Based on the analytical results from these soil samples, there was no evidence that a release has occurred at this EU. With the completion of the soil investigation activities, no further corrective action is required for this EU.

There are four mediums through which humans could possibly be exposed to potential releases from units at the Stadium Parcel:

- Air: There is no documented observed, unpermitted, or on-going air releases at the Stadium Parcel from any of the EUs.
- Groundwater: Currently there is no known or reasonable suspected contamination to the groundwater that poses a risk of exposure from any of the EUs at the Stadium Parcel.

- Surface Water: Currently, there is no known or reasonable suspected contamination to the surface water from any of the EUs at the Stadium Parcel.
- Soil: Currently there is no known or reasonable suspected contamination to the soil that poses a risk of exposure from any of the EUs at the Stadium Parcel.

With the excavation of impacted soil and the use of an ELUR, the corrective actions undertaken at the Stadium Parcel support the requirements of the Connecticut RSRs. Based on the review of all available resources and a thorough site inspection, EPA is proposing that no further corrective action is required at the Stadium Parcel portion of the P&W Main Street Facility.

V. Public Participation

(45) EPA is requesting comments from the public on its proposal that no corrective action will be required at this Stadium Parcel as the action undertaken support the requirements of the Connecticut RSRs. EPA is also accepting comment on the environmental decision that a football stadium can safely be sited on the Stadium Parcel. The public comment period will last forty-five calendar days from the date that this matter is publicly noticed in a local newspaper (Month ??, 2002) Comments may be sent to EPA in writing at the EPA address listed below, and all commenters will receive a copy of the final decision and a copy of the response to comments. A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Juan Perez of the EPA Regional Office (617-918-1354).

The Administrative Record contains all information considered by EPA when making this proposal to not require corrective action at this Stadium Parcel. The Administrative Record is available at the following locations:

U.S. Environmental Protection Agency
Region I
JFK Federal Building (HBT)
1 Congress Street
Boston, MA 02114-2023
Contact: Mr. Juan Perez
Voice: (617) 918-1354
Fax: (617) 918-1294
Hours: Mon - Fri, 9:00 AM - 5:00 PM
E-mail: perez.juan@epa.gov

East Hartford Public Library
840 Main Street
East Hartford, CT 06108
(860) 289-6429
Contact:
Hours: Mon - Thurs, 9:00 AM - 9:00 PM
Fri - Sat, 9:00 AM - 5:00 PM
Sun, 1:00 PM - 4:00 PM (October to May)

Following the forty-five (45) calendar day public comment period, EPA will prepare a final decision

which will address all written comments and any substantive comments presented verbally at a public meeting. This final decision will be incorporated into the Administrative Record. If the comments are such that significant changes are made to the proposal that no further action is needed at this Stadium Parcel, EPA will seek public comments on the revised proposal.

VI. History of Public Participation

In addition to the public participation in the form of public comments that EPA is presently requesting, public participation in the activities associated with the Stadium Parcel have included those identified below. This is a partial listing, and does not include an ongoing series of meetings that were held by the Connecticut Office of Policy and Management (OPM) with Town of East Hartford officials, members of the East Hartford legislative delegation, businesses and residents, as well as myriad other interested parties.

- September 6, 2000 - Public Hearing on Environmental Impact Statement, licenses and other DEP approvals.
- September 5, 2000 - Public Hearing on Environmental Impact Statement, licenses and other DEP approvals.
- August 24, 2000 - Information Open House on the Environmental Impact Statement.
- April 5, 2000 - Two focus group meetings were held on for neighbors abutting the Rentschler Field location.
- April 5, 2000 - Focus group meeting for Town of East Hartford public safety personnel.
- April 10, 2000 - Focus group meeting for the East Hartford Chamber of Commerce.
- April 10, 2000 - Focus group meeting for the North End and South End Residents and Merchants associations.
- April 6, 2000 - Regulatory inter-agency Scoping Meeting on the Environmental Impact Evaluation. The purpose of the Scoping Meeting was to present the project and solicit comments on what issues should be analyzed relating to the natural, human and built environment.
- April 6, 2000 - Statewide public Scoping Meeting on the Environmental Impact Evaluation. The purpose of the Scoping Meeting was to present the project and solicit comments on what issues should be analyzed relating to the natural, human and built environment.
- March 30, 2000 - All day public hearing.
- February 1998 – Public Meeting for the Town of East Hartford Inland Wetlands Commission.



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